



EX PARTE OR LATE FILED

DOCKET FILE COPY ORIGINAL

Regulatory Affairs

Teleport Communications Group  
Two Teleport Drive, Suite 300  
Staten Island, NY 10311-1004  
Tel: 718.355.2000  
Fax: 718.355.4876

October 24, 1996

RECEIVED

OCT 24 1996

Federal Communications Commission  
Office of Secretary

**BY HAND DELIVERY**

William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

Re: Non-Accounting Safeguards  
CC Docket No. 96-149

Dear Mr. Caton:

Teleport Communications Group Inc. ("TCG") hereby gives notice of an ex parte presentation in the above-referenced proceeding. On October 24, 1996, Teresa Marrero of TCG sent the attached letter by hand-delivery to Regina Keeney, Chief of the Common Carrier Bureau. The letter was also hand-delivered to Michelle M. Carey, Radhika V. Karmakar, Cheryl E. Leanza and Carol E. Matthey of the Common Carrier Bureau.

Very truly yours,

*Teresa Marrero*

Teresa Marrero  
Senior Regulatory Counsel  
(718) 355-2939

Attachment

cc: Regina Keeney  
Michelle M. Carey  
Radhika V. Karmakar  
Cheryl E. Leanza  
Carol E. Matthey

No. of Copies rec'd  
List ABCDE

041



Regulatory Affairs

Teleport Communications Group  
Two Teleport Drive, Suite 300  
Staten Island, NY 10311-1004  
Tel: 718.355.2000  
Fax: 718.355.4876

October 24, 1996

Ms. Regina Keeney, Chief  
Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, NW Room 500  
Washington, DC 20554

Re: Non-Accounting Safeguards  
CC Docket No. 96-149

Dear Ms. Keeney:

This is in response to AT&T's ex parte letter filed October 3, 1996 in the above-referenced docket whereby AT&T urges the Commission to adopt certain reporting requirements to assist in detecting and deterring some types of anticompetitive discrimination, as required under Sections 271 and 272 of the 1996 Act.

Teleport Communications Group Inc. (TCGI) strongly supports the principles underlying AT&T's proposal. AT&T's proposal focuses on reporting requirements concerning access, and when coupled with the TCGI's recommended quarterly reports, include provisioning of co-carrier local services. Together, these proposals comprise comprehensive, streamlined, and objective reporting requirements for the efficient and effective enforcement of Sections 271 and 272 of the 1996 Act. To ensure that incumbent LECs ("ILECs," including RBOCs) treat interconnecting competitors in a non-discriminatory manner, the Commission should require that they file with the Commission, and provide to their competitors, comparative quarterly reports that describe their performance in providing interconnection facilities to competitors compared to their performance in provisioning their own requirements.

Specifically, TCG has recommended that the Commission require in the quarterly reports the following information: (1) as measured from the time of the request to deliver service, the length of time taken by an ILEC to provide interconnection arrangements to itself, to its affiliates, and to its competitors; and (2) objective performance information including mean time to repair, service availability standards, and similar performance criteria with regard to interconnection arrangements that the incumbent LEC provides to itself, to its affiliates, and to its competitors. TCGI proposes a limited list of services: DS0, DS1, DS3, CLEC Trunking, Unbundled Loops, NXX code activation, Physical Collocation and Virtual

Ms. Regina Keeney, Chief

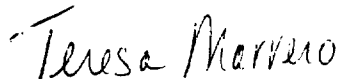
October 24, 1996

Page 2

Collocation. The quarterly reports should be provided for each of the following class of users: TCG, ILEC affiliates, 10 largest retail customers, top three IXC's customers, and major CLECs. Attached is a proposed quarterly report form with a definition of terms for your review.

As TCGI stated in its ex parte letter dated October 8, these reporting measurements can be easily and objectively produced by the incumbent carrier and analyzed by the affected carriers. These self-reporting mechanisms will help ensure that ILEC competitors are treated in a fair and non-discriminatory manner as compared to the ILEC's affiliate. Such self-enforcing and self-informing procedures should relieve the Commission of the need to engage in detailed compliance monitoring. Moreover, by tracking quality criteria, these reporting requirements should encourage the provision of high quality services to American consumers.

Sincerely,



**Teresa Marrero**  
**Senior Regulatory Counsel - Federal**  
**(718) 355-2939**

**Attachments**

cc: Michelle M. Carey, Common Carrier Bureau  
Radhika V. Karmakar, Common Carrier Bureau  
Cheryl E. Leanza, Common Carrier Bureau  
Carol E. Matthey, Common Carrier Bureau  
Leonard, Cali, AT&T  
Charles Griffin, AT&T

## INTERCONNECTION AND COLLOCATION PERFORMANCE REPORT

Quarter/Year \_\_\_\_ / \_\_\_\_

Study Group Classification \_\_\_\_\_

*(TCG/ILEC Affiliates/10 Largest Retail Customers/Top 3 IXC/Major CLECs)*

	<b>Installation Performance</b>								
Type of Facility or Service	Number of Installs/Orders	FOC Response Time of ILEC	Install/Turn-Up Interval (Scheduled)	Percent on Time	Mean Install Time (Actual)	Median Install Time (Actual )	Standard Deviation of Install Time (Actual)	Number of Installs Rescheduled at ILEC Request	# Delayed Due to NXX Jeopardy
Unbundled Loops/ (POTS)									N/A
CLEC Interconnection Trunks									N/A
Special Access/ Private Line DS3									N/A
Special Access/ Private Line DS1									N/A
Special Access/ Private Line DS0									N/A
NXX Code Activation									
Physical Collocation									N/A
Virtual Collocation									N/A

\*Multiplexing installations and failures on special access lines and trunks (DS3, DS1,DS0) are measured within those facility categories rather than as a separate facility category.

## INTERCONNECTION AND COLLOCATION PERFORMANCE REPORT

Quarter/Year \_\_\_\_ / \_\_\_\_

Study Group Classification \_\_\_\_\_

*(TCG/ILEC Affiliates/10 Largest Retail Customers/Top 3 IXC's/Major CLECs)*

Type of Facility or Service	Ongoing Service Performance						Grade of Service	
	Number of Failures	% Failure Rate	Percent Availability	Mean Time to Repair	Median Time to Repair	Standard Deviation of Time to Repair	Bit Error Rate	Blocking Percentage
Unbundled Loops/ (POTS)							N/A	N/A
CLEC Interconnection Trunks							N/A	
Special Access/ Private Line DS3								N/A
Special Access/ Private Line DS1								N/A
Special Access/ Private Line DS0								N/A
NXX Code Activation							N/A	N/A
Physical Collocation							N/A	N/A
Virtual Collocation							N/A	N/A

\*Multiplexing installations and failures on special access lines and trunks (DS3, DS1,DS0) are measured within those facility categories rather than as a separate facility category.

**Interconnection and Collocation Performance Monitoring  
Performance Matrix - Definitions**

**Installation Performance Categories**

1. **Number of Installs/Orders** -- The total number of service orders issued for each type of facility or service, including NXX Code Activation requests and requests for physical or virtual collocation.
2. **FOC Response Time of ILEC** -- The number of days between the date that an order is submitted and the time that it establishes a FOC (firm order commitment) for the order. A FOC sets a due date for the installation service order (sometimes referred to as the "FOC date").
3. **Install/Turn-Up Interval** -- The number of days between the date that an order is received (established on the FOC for each service order) and the date that the order is due to be performed. This performance category measures the average *scheduled* time-frame for completion of installations or turn-ups, rather than the *actual* time-frame.
4. **Percent on Time** -- The total number of service orders that were completed on time divided by the total number of service orders. This measurement does not distinguish between original FOC dates and rescheduled FOC dates (Item 8 below).
5. **Mean Install Time (Actual)** -- The mean average of the total number of days that the carrier *actually* took to process installation orders during the reporting period.
6. **Median Install Time (Actual)** -- The median of the total number of days that the carrier *actually* took to process installation orders during the reporting period (50% of the installation times fall above this figure and 50% fall below it).
7. **Standard Deviation of Mean Install Time (Actual)** -- The standard deviation of the median average of the total number of days that the carrier *actually* took to process installation orders during the reporting period.
8. **Number of Installs Rescheduled at ILEC Request** -- This is the total number of service orders that required a rescheduling to a *later* FOC date (service order due date) at the request of the ILEC.
9. **# Delayed Due to NXX Jeopardy** -- The total number of installations or turn-ups that were delayed due to NXX jeopardy. It measures the impact of NXX jeopardy on retail customers, carrier customers and competitors.

**Ongoing Service Performance**

1. **Number of Failures** -- The total number of trouble reports where the source of the trouble was determined to be the carrier-provider's service problem.
2. **Percent Failure Rate** -- The total number of network failures (Item 1) divided by the total number of circuits, NXX Code Activations or Collocations the study group classification has purchased from the carrier-provider.
3. **Percent Availability** -- Percentage of time that the ordered circuits are available. To determine this percentage, the carrier-provider should do the following:
  - Multiply the total number of circuits by the total hours in the report period to establish the total hours of service availability for the report period.
  - Add all of the measurable time (hours and minutes) for only the Network Reports to establish the total non service availability hours for the report period.
  - Subtract the "non service availability" hours from the "total service availability" hours; to obtain the percentage available, divide the result by the "total service availability" hours.

(continued)

4. **Mean Time to Repair (MTTR)** - Mean average of the time to restore service on a trouble call (from the time the carrier-provider receives a trouble call until the service is restored).
5. **Median Time to Repair (MTTR)** - Median average (50% of the repair times fall above this figure and 50% fall below it) of the time to restore service on a trouble call (from the time the carrier-provider receives a trouble call until the service is restored).
6. **Standard Deviation of the Time to Repair (MTTR)** - The standard deviation of the median average of the time to restore service on a trouble call (from the time the carrier-provider receives a trouble call until the service is restored).

#### **Grade of Service**

1. **Bit Error Rate** - This measures the bit error rate on private lines, non-switched lines and trunks.
2. **Blocking Percentage** - This reports the percentage of time a CLEC trunk is blocked from carrying additional traffic. This is measured by the ILEC, with respect to ILEC customer calls that are blocked from being completed to the CLEC. This should be measured on a trunk by trunk basis, both for "Time Consistent Busy Hour" (TCBH) and "Average Bouncing Busy Hour" (ABBH). Because this information is overall network affecting, and is readily available for switch records, it should be reported monthly by trunk group. TCGI believes CLECs should provide comparable reports to the ILEC.

#### **Updated Information**

Where the RBOC receives or accepts corrected quality reporting information for prior periods, it shall update past reports.